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Attorneys for Plaintiff
LG Electronics, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LG ELECTRONICS, INC.,

Plaintiff,

v.

HITACHI, LTD., HITACHI AMERICA, LTD.,
HITACHI DATA SYSTEMS CORPORATION,
and HITACHI COMPUTER PRODUCTS
(AMERICA), INC.,

QUANTA COMPUTER, INC., and
QUANTA COMPUTER USA, INC.

Defendants.

Case No: 4:07 CV 6511 CW

Proposed
Related

Case No: 3:08 CV 03407 JL ✓

**PLAINTIFF LGE'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED
PURSUANT TO CIVIL L.R. 3-12**

1 Pursuant to Civil L.R. 3-12 and Civil L.R. 7-11, Plaintiff LG Electronics, Inc. ("LGE"), files
2 this administrative motion asking the Court to consider whether *LG Electronics, Inc. v. Quanta*
3 *Computer, Inc., et al.*, No. 3:08-CV-03407 ("the recently-filed case") should be related to *LG*
4 *Electronics, Inc. v. Hitachi, Ltd., et al.*, No. 4:07-CV-6511 ("the Hitachi case").

5 The recently-filed case appears to be related to the Hitachi case under Civil L.R. 3-12. First,
6 the two actions "concern substantially the same parties, property, transaction or event." Civil L.R. 3-
7 12(a). In both matters, LGE is the plaintiff and alleges infringement of U.S. Patent No. 4,918,645
8 ("the '645 patent"). Also for both matters, the technology at issue with respect to the '645 patent is
9 very similar, and involves integrated circuits conforming to the same industry specifications.

10 Second, it "appears likely that there will be an unduly burdensome duplication of labor and
11 expense or conflicting results if the cases are conducted before different Judges." Civil L.R. 3-12(a).
12 The Court has already construed the claims of the '645 patent, and is familiar with at least some of
13 the technology of the accused devices as it relates to the '645 patent. If the recently-filed case is
14 conducted before a different Judge, that Judge will likely have to duplicate effort in understanding
15 the '645 patent, construing its claims, and understanding the technology of the accused devices.
16 Because allegations of infringement of the '645 patent were only recently added to the Hitachi case,
17 both cases are still in their early stages, and largely on the same procedural footing. Whether
18 through relation of the cases, or through formal consolidation of the cases, the Court has the
19 opportunity to avoid duplication of labor, expense, and conflicting results.

20 For the foregoing reasons, and pursuant to Civil L.R. 3-12, LGE respectfully requests that the
21 Court find *LG Electronics, Inc. v. Quanta Computer, Inc., et al.*, No. 3:08-CV-03407 relates to *LG*
22 *Electronics, Inc. v. Hitachi, Ltd., et al.*, No. 4:07-CV-6511.

1 Dated: July 17, 2008

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2 /s/ Peter H. Kang

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13 *Counsel for Plaintiff LG Electronics, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that **PLAINTIFF LGE'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED PURSUANT TO CIVIL L.R. 3-12** was filed electronically, and pursuant to Civil L.R. 5-5 and 5-6, was served on all interested parties in this action. The above document was served to registered ECF recipients via electronic service on July 17, 2008. The above document was also served to other interested parties as follows:

Alan Pak-Lim Lam
QUANTA COMPUTER USA, Inc.
45630 Northport Loop East
Fremont, California, 94538

☒ (VIA HAND DELIVERY) I caused the foregoing document(s) to be delivered by hand to the addressee shown above at the address shown above on July 17, 2008.

Barry Lam
QUANTA COMPUTER, Inc.
No. 211 Wen Hwa 2nd Rd.
Kuei Shan Hsiang, Tao Yuan Shien
Taiwan, R.O.C.

☒ (VIA FEDERAL EXPRESS) I caused the foregoing document(s) to be sent by Federal Express for priority overnight delivery. The above-mentioned document(s) would have been deposited with Federal Express on July 17, 2008 with all charges paid.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 17, 2008

SIDLEY AUSTIN LLP

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